

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
EMILY BREA-ROA,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 22-10043-MJJ
	)	
	)	
DENIS MCDONOUGH, Secretary,	)	
U.S. Department of Veterans Affairs,	)	
Defendant.	)	
_____	)	

**JURY VERDICT FORM**

**Discrimination for Failure to Provide Reasonable Accommodation**

1. Has Plaintiff proven by a preponderance of the evidence that she was qualified to perform her job, with or without reasonable accommodation?

Yes \_\_\_\_\_ No X

[If you answered "YES" to Question 1, then go on to answer Question 2. If you answered "NO" to Questions 1, then skip Questions 2, and go to Question 3.]

2. Has Plaintiff proven by a preponderance of the evidence that Defendant failed to provide a reasonable accommodation for her disability?

Yes \_\_\_\_\_ No X

[Proceed to Question 3.]

**Retaliation**

3. Has Plaintiff proven by a preponderance of the evidence that Defendant took an adverse action against her?

Yes \_\_\_\_\_ No X

[If you answered "YES" to Question 3, then go on to answer Question 4. If you answered "NO" to Questions 3, then skip Question 4, and go to Question 5.]

4. Has Plaintiff proven by a preponderance of the evidence that Defendant took the adverse employment action because of Plaintiff's protected activity?

Yes \_\_\_\_\_ No \_\_\_\_\_

[Proceed to Question 5.]

**Damages**

[Proceed to Question 5 only if you find that Plaintiff has proved one or both of her claims against Defendant (you have answered "YES" to Question 2 or Question 4, or both). If you find that Plaintiff has failed to prove any of her claims, go to the end of the verdict slip and sign it.]

5. Has Plaintiff proven by a preponderance of the evidence that she suffered emotional distress as a result of Defendant's actions?

Yes \_\_\_\_\_ No \_\_\_\_\_

[If you answered "YES" to Question 5, then go on to answer Question 6. If you answered "NO" to Questions 5, then skip Question 6, and go to the end of the verdict slip and sign it.]

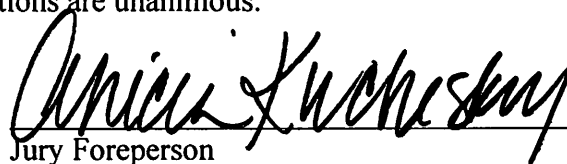
6. What amount of money, if any, do you find will fairly, adequately and reasonably compensate Plaintiff for emotional distress damages?

[numbers] \$ \_\_\_\_\_

[written out] \_\_\_\_\_  
\_\_\_\_\_

I certify that the answers to each of the questions are unanimous.

Dated: December 13, 2024

  
Jury Foreperson